ACKNOWLEDGEMENT OF NOTIFICATION

OF HAZARDOUS WASTE ACTIVITY

09/24/90

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ->	NJD002187755
FACILITY NAME ->	PASSAIC RUBBER CO
MAILING ADDRESS ->	45 DEMAREST DR WAYNE, NJ 07470
INSTALLATION ADDRESS ->	45 DEMAREST DR WAYNE, NJ 07470

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

ATTN: PERMITS ADMINISTRATION BRANCH, ROOM 505

TO: DEC PAUL
PASSAIC RUBBER CO
45 DEMAREST DR
WAYNE, NJ 07470

Call 11:40 9/21 FedX Fixd

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

For Official Use Only

Comments: C C

Installation's EPA ID Number	Approved	Date Received (yr. mo. day)	
C F NJD002187755 T/A C 1		90 09 21	Passaic

I. Name of Installation

PASSAIC RUBBER CO

II. Installation Mailing Address

Street or P.O. Box (C 3): 45 DEMAREST DR

City or Town	State	ZIP Code
C 4 WAYNE	NJ	07470

III. Location of Installation

Street or Route Number (C 5): SAME

City or Town	State	ZIP Code
C 6		

IV. Installation Contact

Name and Title *(last, first, and job title)*	Phone Number *(area code and number)*
C 2 PAUL DEC	201 696 9500

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership *(enter code)*
C R CORPORATION	P

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- [X] 1a. Generator
- [X] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

[ ] A. Utility Boiler [ ] B. Industrial Boiler [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es)*

[ ] A. Air [ ] B. Rail [ ] C. Highway [ ] D. Water [ ] E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

[X] A. First Notification [ ] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number:

ID — For Official Use Only														
C													T/A	C
W														1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
D001	F003	F005			
7	**8**	**9**	**10**	**11**	**12**

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40* CFR *Parts 261.21 — 261.24)*

☐ 1. Ignitable *(D001)* ☐ 2. Corrosive *(D002)* ☐ 3. Reactive *(D003)* ☐ 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Paul J Dec	PAUL J DEC SUPERVISOR	9-19-90

Facility: Fabric Rubber Co.	Loc: Wayne NF	SIC: 3069
ID: NJD002187755	Insp Date: 3-16-93	Revw Date: APR 19 1993
Fac Pers: Ted Kenech	Region: Northern	Revw: MVINCHI
Title: Exec. Vice Pres.	Insp: Brian Jankanish	Notif Date:
Tele: (201) 696-9500	Insp Type: Gen/LDR	Stat: File NOV 3007
Stat: Gen Trans TSD	State Act: NO	Initiative:
Recv TSDF:	Refer:	Oth Prog:
Vol/Mo:	Treat Units:	Comm Date:
GW Wells:	Stor Units:	$ Info:
Permits: Air, NJPDES	Waste Codes: X725, X726, 7005 D001	

Operation: rubber covered metal rolls for printing & paper industry- conveyor belts	Insp Comm (date, re outcome):
Process: ingredients weighed & mixed, placed on rolling machine & evenly platened out & shaped, painted w/ rust inhibitor	
HW Gen: Paint solvents, waste oil	
Waste Codes: X725, X726, F005, D001	Doc Req:
TSDF: Safety Kleen	Fac Comm (date, re, outcome):
HW De: Knowl: X TCA: TCLP:	
Manif Revw: / Out: / Code: LDR: Stor:	
Manif Date Code Def	
NJA 0951865 ~ copy not kept on site	Doc Req:
	TSDF Comm (date, re, outcome):
Field Novs: 9.3(a)1 9.6(b)etc 9.3(a) etc 7.4(f)1 9.7(a)etc 9.4(g)	
Compl Sched: 3-3-93 Achieved:	Doc Req:
Stat ltr cpl. ref):	NOV 3007 Other
Compl Hist:	Cit:
IDate Viol Class Act	Notes:
Rep Docs: Gen/LDR/NOV/MSDS/NJAR	File Docs:

EPA Action	Date Issued	Due Date	Extention Req	New Date	Date Rec'd	Stat/Comments

FILE #:____-____-____

draft

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION & ENERGY

DIVISION OF FACILITY WIDE ENFORCEMENT

BUREAU: Northern

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: Passaic Rubber Company

EPA ID NUMBER: NJD002187255 CASE NUMBER: _____

STREET ADDRESS: 45 Demarest Drive Wayne, NJ

MUNICIPALITY: Wayne COUNTY: Passaic

MAILING ADDRESS: 45 Demarest Drive
(if different) P.O Box 505 Wayne, NJ 07474-0505

BILLING ADDRESS: same as mailing address
(if different)

TELEPHONE # 201-696-9500 FAX # 201-696-0686

BLOCK : 718 LOT : 6

FACILITY PERSONNEL: Jeff Leach - Executive Vice Pres.
(name & title) Mario Roman - Superintendant

INSPECTION DATE: 3/16/93

INSPECTOR'S NAME & TITLE:
Brian Farhanish

OTHER STATE/EPA PERSONNEL: _____

REPORT PREPARED BY: Brian Farhanish

REVIEWED BY: [illegible] DATE OF REVIEW: 3-19-93

DFWE 29 REV. 1/12/93

INSPECTION DATE(S): 3/17/93
TIME IN: 1036
TIME OUT: 1534

PHOTOS TAKEN: YES(___) NO(✓) QUANTITY(___) ATTACH PHOTO LOG

SAMPLES TAKEN: YES(___) NO(✓) HOW MANY(___) ATTACH SAMPLE LOG

SITE BACKGROUND INFORMATION

EMPLOYEES: ~80 SHIFTS/WEEK: 2-8hr / 5 days

DATE OPERATIONS BEGUN: 1919 SIC CODE: 3065

ACRES: ~21.5 # OF BUILDINGS/SQFT: 1/50,000

PRODUCTS PRODUCED: Rubber covered metal rolls for printing & paper industry - conveyor belts

PREVIOUS OPERATIONS AT SITE: none

WATER SUPPLY- PUBLIC: ✓ PRIVATE WELL: ___

SOLID WASTE DISPOSAL: yes

FLOOR DRAINS: yes

DRAINS CONNECTED TO- POTW: ✓ SEPTIC SYSTEM: ___

MONITORING WELLS: none

NON-HW. TANKS ON SITE : 1 - 500 gallon raw oil

AIR PERMITS: several - for vents

NJPDES PERMITS: 1 - non-contact cooling water

OTHER PERMITS: none

To the file
Through Farouk Afrasiabi
From Brian Farbanish
Re Passaic Rubber Company (PRC) 45 Demarest Drive
Wayne, NJ
Identification Number NJA002187755
3/16/93

INSPECTION AND GENERAL FACILITY DESCRIPTION AND OPERATIONS

Background:

On March 12, 1993 the inspector received a referral from the Patterson Division Of Health (PDOH) regarding a possible joint inspection at the Passaic Rubber Company. The inspector then contacted PDOH and discussed the case with Christopher Sudol (an Environmental Specialist-phone number 201-881-3914).

Mr. Sudol explained that he had received an anonymous complaint regarding the illegal storage of many hazardous waste drums including several leaking and open drums at PRC. He also explained that earlier he had conducted an initial inspection at PRC and had observed numerous drums being stored in the rear of the facility in addition to several drums being stored over 90 days. Next, Mr. Sudol indicated that prior to his inspection, 5 gallons of waste oil had leaked out of a drum. This spill was later remediated. In addition, he explained that PRC had initiated the hazardous waste drum removal process in October 1992 (for the drums stored over 90 days) but as of his inspection, had not removed the waste. During October 1992, six of the 55 gallon storage drums were classified by the consultant (5 contained waste oil and 1 contained waste solvents). Next, Mr. Sudol explained that the other nine drums of hazardous waste in this area were generated after the October 1992 date.

Finally, a joint inspection was arranged for March 16, 1993.

Inspection:

During the inspection, Jeff Leach and Marvin Roman described the main function of the facility. PRC is in the business of manufacturing rubber covered metal rolls for the printing and paper industry, electrical tape used to join cables together and conveyor belts.

After the order is received, the appropriate ingredients are ordered. As the ingredients are received, the compound required for the order is created and formulated. Next, the ingredients are weighed and the mixing process begins.

According to Mr. Roman, the rubber is mixed using one of two methods. Either it is mixed in one of several large blenders (each holding approximately 175 pounds) or it is blended by hand.

Next, a sample of the material is taken and analyzed. If the sample meets the various criteria, then the manufacturing process is continued.

The rubber is then placed onto a rolling machine and is evenly flattened. As needed, the rubber is then either placed directly onto a roll (prior to being inspected, packaged and shipped to the customer) or it is transferred

To the file
Through Farouk Afrasiabi
From Brian Farbanish
Re Passaic Rubber Company (PRC) 45 Demarest Drive
Wayne, NJ
Identification Number NJA002187755

Inspection Continued

to another machine that will cut and shape the rubber.

The cutting and shaping machines are used to manufacture several different rubber items at PRC. As needed, the rubber items in these machines are cleaned using small brushes and a solvent. This solvent cleaning also helps to ensure that the rubber items will stick together and can be joined more easily. In order to ensure that there is no cross contamination between the various products, the solvent is replaced between the cleaning of the different products. Any waste generated from this process is placed into a 55 gallon satellite storage drum in this area. As of this inspection, there is no hazardous waste being stored in this area.

During production, the rolls are painted with a rust inhibitor. This inhibitor extends the performance and life of the roll. The painting is done before the rubber is rolled onto the roll. As described by Mr. Leach, the rolls are placed into a shot blast unit prior to the painting. This unit is used to remove the jagged edges on the roll. Next, the item is hand painted. At the completion of the painting, the brushes are cleaned and placed back into storage to await the next painting.

As needed, the machines are cleaned and the waste oil is deposited into a 55 gallon drum in the cutting and shaping area. As this drum becomes full, it is transferred to the hazardous waste storage section of the facility.

Presently, the hazardous waste is being stored in two large walk-in containers (each approximately 8 feet high x 8 feet wide x 24 feet long). The one walk-in container contains six 55 gallon drums of waste oil, one 55 gallon drum of waste solvents and two 55 gallon drums of spill cleanup material. These drums are not properly labeled. However, be the conclusion of the inspection, the drums were labeled properly.

The second walk-in container is housing five 55 gallon drums of waste oil and one 55 gallon drum of waste solvents. These drums have all been stored over 90 days (since October 1992) and are not properly labeled.

Prior to the inspection of the hazardous waste storage area, Mr. Roman and Mr. Leach explained that they have contacted a consultant (Ecoflo) and have arranged to have all of the waste removed on 3/24/93.

Marvin Roman and Jeff Leach were informed at the conclusion of the inspection that there would be a $1370.00 fee for the initial inspection, a $700.00 fee for the compliance inspections and a $660.00 fee for the compliance reviews.

Currently, PRC is a fully regulated generator. When the waste is removed from the facility, PRC will no longer be a fully regulated generator of hazardous waste.

To the file
Through Farouk Afrasiabi
From Brian Farbanish
Re Passaic Rubber Company (PRC) 45 Demarest Drive
Wayne, NJ
Identification Number NJA002187755

HAZARDOUS WASTE GENERATION

Waste Streams:

The oil waste was generated during the routine maintenance of the machinery at the facility. The solvent waste was generated during the cleaning of various rubber items during manufacturing. The spill cleanup material was generated during the remediation of the oil spill mentioned earlier in this report.

According to Mr. Leach, after the waste on site is removed, PRC will only be generating one 55 gallon drum of solvent waste approximately every 5 months and six 55 gallon drums of waste oil approximately every five months. The solvent wastes will be manifested off site prior to the accumulation of 100 kg of and the waste oil will be manifested off site prior to the accumulation of 1001 gallons.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP EPA ID NO: NJD002182897

1200 SYLVAN ST

LINDEN NJ 07036

Under manifest number NJA 0951865 line number 11A (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D001

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	____
Benzene	0.07	3.7	____
n-Butyl alcohol	5.0	5.0	____
Carbon disulfide	1.05	4.81	____
Carbon tetrachloride	0.05	0.96	____
Chlorobenzene	0.15	0.05	____
Cresols (and creslyic acid)	2.82	0.75	____
Cyclohexanone	0.125	0.75	____
1,2-Dichlorobenzene	0.68	0.125	____
Ethyl acetate	0.05	0.75	____
Ethyl benzene	0.05	0.053	____
Ethyl ether	0.05	0.75	____
Isobutanol	5.0	5.0	____
Methanol	0.25	0.75	____
Methylene chloride	0.2	0.96	____
Methylene chloride(from Pharm. Industry)	0.44	0.96	____
Methyl ethyl ketone	0.05	0.75	____
Methyl isobutyl ketone	0.05	0.33	____
Nitrobenzene	0.65	0.125	____
Pyridine	1.12	0.33	____
Tetrachloroethlyene	0.079	0.05	____
Toluene	1.12	0.33	____
1,1,1-Trichloroethane	1.05	0.41	____
1,1,2-Trichloroethane	0.03	7.6	____
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	____
Trichlorethylene	0.062	0.091	____
Trichlorofluoromethane	0.05	0.96	____
Xylene	0.05	0.15	____

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	____
Arsenic (As) Nonwastewaters	500.0	None	____
Mercury (Hg) Nonwastewaters	20.0	None	____
Nickel (Ni)	134.0	None	____
Thallium (Tl)	130.0	None	____
Chlorinated Biphenyls (PCB's)	50.0	Incineration	____

These treatment standa
do not preclude solver
recovery prior to disp
Subsequent disposal o
unrecovered waste is
subject to these stand

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
Waste Code	Description					
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	____	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	____	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	____	268.42(a) DEACT	____	
D004	Arsenic (As)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	____	268.41(a)	____	
D006	Cadmium (Cd)	268.43(a)	____	268.41(a)	____	
D007	Chromium (Cr)	268.43(a)	____	268.41(a)	____	
D008	Lead (Pb)	268.43(a)	____	268.41(a)	____	
D009	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	____	268.42(a) RMERC	____	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	____	268.41(a)	____	
D011	Silver (Ag)	268.43(a)	____	268.41(a)	____	
Other Codes	See attachment for supplemental list		____		____	

Generator Name: PASSAIC RUBBER CO EPA ID: NJD002187755

Generator Representative Signature: X Paul Den

Name & Title of Representative: X Roll Building Manager

Safety-Kleen Sample Number: 111247 Control Number: 0073938

NOTE: The USEPA has not determined treatment standards for the new TCLP EPA Waste Numbers: D018 through D043.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP EPA ID NO: NJD002182897

1200 SYLVAN ST

LINDEN NJ 07036

Under manifest number NJA 0951865 line number 113 (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: F005 D001

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	
Benzene	0.07	3.7	
n-Butyl alcohol	5.0	5.0	
Carbon disulfide	1.05	4.81	
Carbon tetrachloride	0.05	0.96	
Chlorobenzene	0.15	0.05	
Cresols (and cresylic acid)	2.82	0.75	
Cyclohexanone	0.125	0.75	
1,2-Dichlorobenzene	0.68	0.125	
Ethyl acetate	0.05	0.75	
Ethyl benzene	0.05	0.053	
Ethyl ether	0.05	0.75	
Isobutanol	5.0	5.0	
Methanol	0.25	0.75	
Methylene chloride	0.2	0.96	
Methylene chloride(from Pharm. Industry)	0.44	0.96	
Methyl ethyl ketone	0.05	0.75	X
Methyl isobutyl ketone	0.05	0.33	
Nitrobenzene	0.65	0.125	
Pyridine	1.12	0.33	
Tetrachloroethlyene	0.079	0.05	
Toluene	1.12	0.33	X
1,1,1-Trichloroethane	1.05	0.41	
1,1,2-Trichloroethane	0.03	7.6	
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	
Trichlorethylene	0.062	0.091	
Trichlorofluoromethane	0.05	0.96	
Xylene	0.05	0.15	

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	
Arsenic (As) Nonwastewaters	500.0	None	
Mercury (Hg) Nonwastewaters	20.0	None	
Nickel (Ni)	134.0	None	X
Thallium (Tl)	130.0	None	
Chlorinated Biphenyls (PCB's)	50.0	Incineration	

These treatment standar do not preclude solvent recovery prior to dispo Subsequent disposal of unrecovered waste is subject to these standa

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
Waste Code	Description					
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT		NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT		
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT		268.42(a) DEACT		
D004	Arsenic (As)	268.43(a)		268.41(a)		Variance until 5-8-92
D005	Barium (Ba)	268.43(a)		268.41(a)		
D006	Cadmium (Cd)	268.43(a)		268.41(a)		
D007	Chromium (Cr)	268.43(a)		268.41(a)		
D008	Lead (Pb)	268.43(a)		268.41(a)		
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)		268.41(a)		Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)		268.42(a) RMERC		Variance until 5-8-92
D010	Selenium (Se)	268.43(a)		268.41(a)		
D011	Silver (Ag)	268.43(a)		268.41(a)		
Other Codes	See attachment for supplemental list					

Generator Name: PASSAIL RUBBER EPA ID: NJD002187755

Generator Representative Signature: X Paul Doe

Name & Title of Representative: X Paul Building Manager

Safety-Kleen Sample Number: 111248 Control Number: 0073851

NOTE: The USEPA has not determined treatment standards for the new TCLP EPA Waste Numbers: D018 through D043.

HAZARDOUS WASTE INVENTORY

LOCATION	WASTE CODES	DESCRIPTION	QUANTITY PRESENT
Haz. waste storage area	F005	55 gallon drums - solvents	2
Haz waste storage area	X726	55 gallon drums from machinery	11
Haz waste storage area	X735	55 gallon drums - dirt & speedy dry & oil spillage	2

add additional pages as needed

MANIFESTS REVIEWED

Manifests reviewed from 3/15/90 through 3/15/93

Number of manifests in compliance: 0

Number of manifests NOT in compliance: 1

Total number of manifests reviewed: 1

According to the manifests, does the facility import or export any waste? YES ___ NO ✓

(if yes, complete the import/export section of this report)

List manifest document numbers of those manifests not in compliance and note each deficiency.

Attach copies of manifests which have deficiencies.

Manifest#	DATE	N.J.A.C.7:26-	Comments
NJA0951865	4/4/91	7.4(f)	Manifest copy not on site

add additional pages as needed

GENERATOR INDEX

CHECK THE SECTIONS AND ACTIVITIES OF THIS REPORT WHICH ARE APPLICABLE TO THE FACILITY AND COMPLETE THOSE SECTIONS FOR THIS INSPECTION.

GENERATOR WASTE MANAGEMENT PRACTICES

SECTION 1.

WASTE DETERMINATION:

	YES	NO
DOES the facility generate "solid waste".	✓	
DOES the facility generate a "hazardous waste".	✓	
IS THE FACILITY CORRECTLY CLASSIFYING ITS WASTES?	✓	

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

8.5(a) Generator failed to determine if its "solid waste" is hazardous? _____

7.4(x) Generator FAILED to properly classify its waste according to the "Hierarchy". _____

COMMENTS

SECTION 3.

SATELLITE ACCUMULATION AREAS N/A

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE SATELLITE ACCUMULATION REGULATIONS?	____	____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

9.3(d)1 Quantity of waste EXCEEDS 55 gal.or 1 qt. of acutely hazardous waste. _____

9.3(d)2 Containers FAIL to:

Meet the standards of 7.2 (Container Requirements). _____

Poor or leaking container. _____

Container made of incompatable material. _____

Container not kept securely closed. _____

9.3(d)3 Accumulation area is:

NOT at or near a point of generation. _____

NOT under the control of the operator. _____

9.3(d)4 Containers are NOT marked "Hazardous waste". _____

9.3(d)5 Containers NOT marked with date when filled. _____

9.3(d)6 Containers were NOT moved from satellite area within three days. _____

COMENTS

SECTION 4.

GENERATOR CONTAINER STORAGE AREAS

		YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE GENERATOR STORAGE REGULATIONS?		___	✓
IF NO, CHECK THE ITEMS OF NON COMPLIANCE.			
7.2(a)	NO manifest number on containers ready for disposal.		___
7.2(b)	Containers FAILED to meet DOT regulations. (49CFR 171,179)		___
9.3(a)1	Waste ACCUMULATED OVER 90 DAYS.		✓
9.3(a) etc 9.3(a)3	Containers NOT marked with accumulation start date or "Hazardous Waste".		___
9.4(d)1i	Containers NOT of adequate construction.		___
9.4(d)1ii	Closures NOT of sufficient strength.		___
9.4(d)2	Containers NOT in good condition.		___
9.4(d)3	Containers NOT compatible with waste.		___
9.4(d)4i	Containers NOT kept closed.		___
9.4(d)4iii	Containers NOT properly handled.		___
9.4(d)4iv	Hazardous wastes NOT segregated.		___
9. 4(d)4v	ID Labels NOT visible.		___
9.4(d)4vi	Cleaning of empty containers does NOT take place in a designated area.		___
94.(d)4vii	Rinse waters NOT handled properly.		___
9.4(d)4viii	Container reuse NOT in compliance with DOT regulations.		___
9.4(d)5	The storage area is NOT inspected.		___
9.4(d)6	Containers of ignitable and reactive wastes are NOT located at least 50 feet from the facility's property line.		___

9.6(d) Access to communication or alarm system is NOT maintained. _____

9.6(e) INADEQUATE aisle space. _____

COMMENTS:

SECTION 5

WASTE OIL N/A

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE WASTE OIL STORAGE REGULATIONS?	____	____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

The generator ONLY generates or accumulates less than 1001 gals. of waste oil per month and:

7.7(d) Generator FAILED to obtain receipts and retain them for three years. _____

9.2(b) If under ground tanks are used to store waste oil, the generator is NOT a:

1. New commercial service station waste oil tanks of <1001 gal capacity* _____

or does NOT:

2. Use underground tanks in existence and in use for Hazardous Waste storage prior to 1/17/83. _____

NOTE: If the generator generates over 100 kg of hazardous waste and any listed waste oil or generates/stores *>1001* gal of waste oil in any given month MUST be in compliance with ALL generator requirements.

COMMENTS:

Company has not previously shipped waste oil off site.

SECTION 6.

N/A

ABOVE GROUND TANKS

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE ABOVE GROUND <90 DAY STORAGE TANK REGULATIONS?	___	___

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

If the generator stores hazardous waste in an above ground tank for <90 days, the generator FAILED to:

9.3(b)	Have a letter of approval?	_____
9.3(b)2	Have overfilling controls?	_____
9.3(b)3	Have secondary containment?	_____
9.3(b)4	Insure that 99% of the tank can be emptied?	_____
9.3(b)5	Empty the tank every 90 days?	_____
9.3(b)6	Remove all wastes from the tank(s)?	_____
9.3(b)8	If part of the tank is below grade, all of the tank cannot be visually inspected.	_____
9.3(b)9	The tank is not labeled with the words "HAZARDOUS WASTE".	_____

COMMENTS

_____

_____

_____

_____

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_____

_____

SECTION 7.

WASTE MANAGEMENT

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE WASTE MANAGEMENT REGULATIONS?	___	✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

12.1(a) Generator IS ACTING as a TSDF by:

1. Treating hazardous waste. _____
2. Storing hazardous waste. _____
3. Disposing of hazardous waste on site? _____

9.3(a)1 Site IS ACTING as a generator but accumulating waste in containers or approved tanks for more than 90 days. ✓

9.2(a)2 Hazardous waste IS handeled in a manner which causes or may cause a spill. _____

N.J.S.A. 58:10-23.11(c)

Discharge of a hazardous substance. _____

N.J.S.A. 58:10-23.11(e)

Failure to report the discharge. _____

IF THE FACILITY IS ACTING AS A TSDF, COMPLETE THE TSD REPORT.

COMMENTS:

SECTION 8.

GENERATOR MANIFESTS

		YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE GENERATOR MANIFEST REGULATIONS?		___	✓
IF NO, CHECK THE ITEMS OF NON COMPLIANCE			
7.4(a)3	Generator FAILED to prepare a Hazardous Waste Manifest.		
7.4(a)4	Each manifest failed to have the following information:		
7.4(a)4i	Generator's name, mailing address (site address if different), and phone number.		
7.4(a)4ii	The generator's EPA ID number.		
7.4(a)4iii	The transporter(s) name, phone number, NJ registration and decal numbers.		
7.4(a)4iv	The transporter(s) EPA ID number.		
7.4(a)4v	The name, address and phone number of the designated TSD facility.		
7.4(a)4vi	The TSDF's EPA ID number.		
7.4(a)4vii	The proper USDOT description.		
	OR		
	Complete NOS information in item J.		
7.4(a)4viii	Special handling instructions.		
7.4(a)5i	The generator signature and date.		
7.4(a)5ii	Transporter's signature & date.		
7.4(a)5iii	Generator FAILED to retain copy and forward copies to the state of origin & state of destination.		
7.4(a)5v	Generator FAILED to give the remaining copies to hauler.		

7.4(e)2	Generator FAILED to use a registered Transporter.	_____
7.4(e)3	Generator FAILED to designate an authorized TSD or reuse facility.	_____
7.4(e)4	Generator FAILED to utilize an authorized TSD.	_____
7.4(f) etc	Generator FAILED to maintain the following facility records for three (3) years:	
7.4(f)1	Manifests.	✓
7.4(f)2	Annual and/or exception reports.	_____
7.4(f)3	Generator FAILED to maintain records during the course of unresolved enforcement action or as requested.	_____
7.4(h)1	Generator has FAILED to receive signed copies of all manifests.	_____
7.4(h)1	Generator FAILED to notify the TSD or Department within 35 days.	_____
7.4(h)2	Generator FAILED to file exception reports within 45 days.	_____

COMMENTS:

_____

_____

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_____

SECTION 9.

HAZARDOUS WASTES EXPORTATION

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE EXPORT REQUIREMENTS OF THE REGULATIONS?	___	✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

Generator FAILED to:

7.4(b)	Notify the EPA of its intent to export.	___
	Obtain acknowledgement of consent from the receiving country.	___
7.4(c)	Provide the information required in N.J.A.C. 7:26-7.4 ET. SEQ.to the EPA.	___
7.4(c)7	Insure that the acknowledgement is attached to each manifest.	___
7.4(c)8	Deliver a copy of the Manifest to Customs at the point of departure?	___
7.4(g)4	Submit an annual report to the EPA?	___

COMMENTS:

SECTION 10.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE CONTINGENCY PLAN & EMERGENCY PROCEEDURES REGULATIONS?	___	✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

9.7 etc		✓
9.7(a)	NO contingency plan.	___
9.7(b)	Generator FAILED to impliment the plan in an emergency.	___
9.7(c)	Plan FAILED to describe the response actions facility personnel and local authorities shall take.	___
9.7(d)	Generator FAILED to prepare a Spill Prevention, Control, and Counter-measures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Counter-measure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq.	___

NOTE: DPCC: A schedule of regulated storage volumes and their effective dates can be found in N.J.A.C. 7:1E-4.6(b).

SPCC: Storage of any kind of oil and most oil products including gasoline and fuel oils If:

1. >660 gal single tank
2. >1,320 gal multiple tanks
3. >42,000 gal underground storage.

9.7(d)	Generator has a DPCC or SPCC plan, and FAILED to amend that plan to incorporate hazardous waste management.	___
9.7(e)	Plan FAILS to describe arrange-ments agreed to by local authorities.	___
9.7(f)	Plan FAILS to list names, addresses, and phone numbers (office and home) of emergency coordinators.	___

9.7(g) Plan FAILS to include a list, location, AND CAPABILITIES of all emergency equipment. _____

9.7(h) Plan FAILS to describe evacuation procedures, evacuation signal(s) AND routes. _____

9.7(i) Generator FAILED to:

1. Keep a copy of the plan at the facility. _____
2. Submit the contingency plan to local authorities. _____

9.7(j) Generator FAILED to revise the contingency plan when:

1. Applicable regulations are revised. _____
2. The plan fails. _____
3. The facility changes. _____
4. The Emergency Coordinator changes. _____
5. The emergency equipment changes. _____

9.7(k) Emergency coordinator NOT available. _____

COMMENTS

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_____

SECTION 11.

PERSONNEL TRAINING

		YES	NO
	IS THE FACILITY IN COMPLIANCE WITH THE PERSONNEL TRAINING REGULATIONS?	___	✓
	IF NO, CHECK THE ITEMS OF NON COMPLIANCE.		
9.4(g) 9.4(g)2	Training program **NOT** directed by a person trained in hazardous waste management procedures and, is it **NOT** designed to ensure that facility personnel are able to respond effectively.		✓
9.4(g)3	Program **FAILS** to include the following response procedures:		
9.4(g)3i	Use of personnel safety equipment.		
9.4(g)3ii	Procedures for using facility emergency and monitoring equipment.		
9.4(g)3iii	Key parameters for automatic waste feed cut-off systems.		
9.4(g)3iv	Procedures for utilizing communications or alarm systems.		
9.4(g)3v	Responds proceedures for fires & explosions.		
9.4(g)3vi	Ground water contamination responds procedures.		
9.4(g)3vii	Shutdown procedures.		
9.4(g)4	Personnel **have NOT** successfully completed training within six months of the date of their employment or assignment to a new position at the facility.		
9.4(g)5	Personnel do **NOT** take part in an annual review of training.		
9.4(g)6	**NO** written documentation of the following:		
9.4(g)6i	Job title for each position and the name of the employee filling each job.		

94(9)6ii	A written job description.	_____
9.4(g)6iii	Description of the training given to personnel.	_____
9.4(g)6iv	Documentation of actual training.	_____
9.4(g)7	Training records are **NOT** kept.	_____
9.4(g)8	Semi-annual drills, involving all employees and local authorities are **NOT** conducted.	_____

AND,

9.4(g)8i	Generator **FAILED** to petition the Department for an exemption from the drill requirement.	_____

OR

9.4(g)8ii	Generator **FAILED** to petition the Department for an exemption excluding local officials.	_____

COMMENTS

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SECTION 12.

PREPAREDNESS AND PREVENTION

		YES	NO
	IS THE FACILITY IN COMPLIANCE WITH THE PREPAREDNESS & PREVENTION REGULATIONS?	___	✓
	IF NO, CHECK THE ITEMS OF NON COMPLIANCE.		
9.6(b)	Facility FAILS to have:		✓
9.6(b)1	Communications or alarm system.		___
9.6(b)2	A telephone or device to summon emergency assistance.		___
9.6(b)3	Portable emergency equipment.		___
9.6(b)4	Adequate Water supply.		___
9.6(c)	Generator FAILED to test and maintain emergency equipment.		___
9.6(f)	Generator FAILED to:		
9.6(f)1	Familiarize Police, fire departments, and emergency response teams with the layout of the facility, & hazardous waste handled.		___
9.6(f)2	Have an agreement designating primary emergency authority to a specific police and fire department where more than one Police and fire department are involved.		___
9.6(f)3	Make agreements with emergency response contractors, and equipment supplier.		___
9.6(f)4	Make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries result from fires, explosions, or discharges at the facility.		___
9.6(f)5	Make arrangements with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually.		___

9.6(f)6 Document when authorities identified in (f)1 through 5 above declined to enter into such arrangements. _____

COMMENTS:

SECTION 13.

N/A

WASTE WATER TREATMENT PLANT SLUDGE

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE WWTP REQUIREMENTS?	___	___

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

If the answer is YES to any of the questions listed below, the sludge drying unit is subject to Hazardous Waste Facility permit requirements and must be regulated as a Miscellaneous Unit pursuant to N.J.A.C. 7:26-10.9 et seq. The generator is operating as an illegal TSDF and SHOULD BE CITED for being in violation of N.J.A.C. 7:26-12.1(A).

---

1. "WASTE WATER TREATMENT UNIT" QUALIFICATION PER 7:14A-4.3

The drying unit is NOT part of a waste water treatment facility which is subject to regulation under Section 402 or Section 307(b) of the federal Clean Water Act. _____

Note: In order to be considered "part of" the facility, the dryer need not be physically connected to the W.W.T. facility, but must be located at the same site.

The drying unit does NOT treat a sludge which is generated on-site by the wastewater treatment facility. _____

The sludge is NOT to be treated as a regulated hazardous waste as defined at N.J.A.C. 7:26-8. _____

The drying unit does NOT meet the definition of a "tank" at N.J.A.C. 7:14A-4.3. _____

Note: "Tank" means a stationary device designed to contain an accumulation of hazardous waste and constructed of non-earthen materials which provide the structural strength to totally contain the waste. Dryers that are integrally equipped with feed or discharge hoppers for treatment of sludge in bulk satisfy the definition of "tank". Others not so designed may still be considered tanks on a case-by-case bases.

2. PRIMARY PURPOSE RESTRICTION

The primary purpose of the dryer is **NOT** to dehydrate sludge, **BUT TO** destroy sludge to produce an ash residue. _____

3. THERMAL INPUT LIMITATION:

The dryer's maximum total thermal input, excluding the heating value of the sludge itself, IS MORE than 2,500 BTU's per pound of sludge treated on a wet-weight bases. _____

Note: Total thermal input equals dryer heating capacity (converted to btu/min) multiplied by the maximum drying time divided by weight of sludge per batch.

use the space provided below to determine the total thermal input.

COMMENTS:

CONFIDENTIAL - RECOMMENDATIONS

TO: FILE _____ **DATE** _____

FROM: _____

SUBJECT: _____

EPA. ID. #: _____ **INSPECTION DATE:** _____

COMMENTS:

add additional pages as needed

FWE-008
10/92

1/1

New Jersey Department of Environmental Protection and Energy
Div. of Facility Wide Enforcement — Hazardous Waste Section
1259 Route 46, Bldg. #2, Parsippany, N.J. 07054
(201) 299-7592

NOTICE OF VIOLATION

EPA ID NO. NJ0002187755 DATE 3/16/93

NAME OF FACILITY Passaic Rubber Co.

LOCATION OF FACILITY 45 Demarest Drive Wayne, N.J.

NAME OF OPERATOR Jeff Leach

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION 9.3(a), Waste accumulated over 90 days. 9.3(a) etc Hazardous waste containers not properly labeled 7.4 (f) Failure to have appropriate manifest copies and manifest information on site etc 9.7(a) etc Failure to have properly maintained contingency plan 9.4(a) Failure to have proper personnel training etc 9.6 (b) etc Failure to have proper preparedness and prevention documentation

Remedial action to correct these violations must be initiated immediately and be completed by 3/31/93. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $50,000 per violation.

Brian Farbman
Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy

Copy Received by: for Passaic Rubber Company

Waste Minimization Checklist

GENERATOR CHECKLIST

MANIFEST

GENERAL 262.20	YES	NO	N/A
Does the generator, offer for tranportation, hazardous waste for off-site treatment/disposal? If yes, proceed to next question. If no, proceed to 264.75/265.75.		✓	
262.23 Does the generator sign the manifest certification which states;			

unknown the only manifest used by the site could not be found

" If I am a large quantity generator, I have a program in place to reduce the volume and toxicity of the waste generated to the degree I have determined to be economically practical and that I have selected the practical method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the enviroment; OR, if I am a small quantity generat :, I have made a good effort to minimize my waste generation and select the best waste management method that is .vailable to me and that I can afford."

Does the generator have a written Waste Minimization Plan?		✓	
If no, is the generator able to describe his plan orally.	✓		

COMMENTS:
(Explain in this space the areas that visually show evidence that a program is in place and is being implemented)

- the small amount of solvent waste on site

ANNUAL/BIENNIAL REPORT

	YES	NO	N/A
262.41			
Has the generator submitted Annual (AR) or Biennial reports (BER) to the appropiate regulatory agency? company only had 1 shipment of waste removed - it was under the required amount.	—	—	✓

The inspector should review these reports prior to the inspection (see above), and should try to verify the information in the report during his/her site inspection. The following questions should be addressed during the inspection.

262.56(a)(5) Does the BER or AR include the efforts undertaken during the year to reduce the volume of toxicity of the wastes generated?	—	—	✓
Does the BER or AR include a description of the changes in volume and toxicity of the wastes actually achieved during the year in comparison to previous years?	—	—	✓
Do these efforts match the information contained in the generator's written or verbally described waste minimization program.	—	—	✓
Is the BER or AR certification signed by the generator or authorized representatives?	—	—	✓

WM-2

TOXICITY CHARACTERISTIC ("TC") INSPECTION CHECKLIST

1. Has the handler tested all its solid waste streams using the TCLP?

   Yes____ No V

   a) If no, are there any waste streams which should be tested.

   Explain No. Facility only manifests Coal & Fees wastes off site. The appropriate information is included with the manifests

   b) If the handler is a TSD, has the owner/operator revised its waste analysis plan to incorporate the new TCLP requirements?

   N/A Yes____ No____

2. Does the handler generate waste exceeding the regulatory level for any constituent listed in Table I-TC?

   Yes____ No V

   If no this checklist need not be completed.

3. Was the handlers waste(s) considered a federal hazardous waste prior to the promulgation of the new TCLP requirement?

   Yes____ No____

   If No, proceed to question number 4. If yes, answer questions 3a), 3b) and 3c) and then stop.

   a) Have both the listed and characteristic waste code been assigned, were a listed waste exhibits a characteristic for which the waste is not listed?

   Yes____ No____

   Comments _____

   b) Does the handler determine and list on its manifests all of it's waste(s) TCLP characteristics?

   Yes____ No____

   Comments _____

c) If the generator is also a TSD, has the owner or operator submitted a revised Part A permit application or if permitted a permit modification request indicating the new hazardous constituent(s) found in their waste(s)?

Yes_____ No_____

4. Is the waste managed as a hazardous waste?

Yes_____ No_____

If No, this is a high priority violation. Be sure to obtain a detailed description of the wastes final disposition.

Comments _____

a) If the generator is also a TSD, has the owner or operator submitted a revised Part A permit application or if permitted a permit modification request for the previously unregulated waste or hazardous waste unit which has become subject to hazardous waste regulation as a result of the new TC Rule?

Yes_____ No_____

NOTE: The inspector should bear in mind that any waste stream, unit or handler newly regulated on account of the change in the analytical procedures associated with the Toxicity Characteristic may now be subject to all the applicable requirements of N.J.A.C. 7:26-1, 7 - 12 and 40 C.F.R. Parts 260 - 270. All applicable current checklists should be used to determine compliance status.

EFFECTIVE DATES FOR COMPLIANCE WITH TC REQUIREMENTS

Generators of ≥1,000 kg/mo. of hazardous waste	9/25/90
Generators of <1,000 kg/mo. of hazardous waste	3/29/91

ADDITIONAL COMMENTS: _____

Subcategory Checklist

I. Characteristic Wastes.

A) Does facility handle D001 waste ?
Yes ✓ No_____
If yes, which subcategory(ies) ?

Ignitable compressed gas	Yes_____	No ✓
Ignitable liquids High TOC ≥ 10%	Yes ✓	No_____
Ignitable liquids Low TOC < 10%	Yes_____	No ✓
Ignitable reactives	Yes_____	No ✓
Oxidizers [wastewater or non-wastewater]	Yes_____	No ✓
Ignitible liquids [wastewater or non-wastewater]	Yes ✓	No_____

B) Does facility handle D002 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

Acids, pH ≤ 2 [wastewater or non-wastewater]	Yes_____	No_____
Alkaline, pH ≥ 12.5 [wastewater or non-wastewater]	Yes_____	No_____
Radioactive high level wastes	Yes_____	No_____

C) Does facility handle D003 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

Explosives [wastewater or non-wastewater]	Yes_____	No_____
Reactive cyanides:		
•wastewater - cyanides ≥ 0.86 ppm	Yes_____	No_____
•non-wastewater - total cyanides ≥ 590 ppm and amenable cyanides ≥ 30 ppm	Yes_____	No_____
Reactive sulfides [wastewater or non-wastewater]	Yes_____	No_____
Reactive [wastewater or non-wastewater]	Yes_____	No_____

D) Does facility handle D004 waste ?
Yes_____ No ✓
If yes, is it this subcategory ?

Radioactive high level wastes	Yes_____	No_____

E) Does facility handle D005 waste ?
Yes_____ No ✓
If yes, is it this subcategory ?

Radioactive high level wastes	Yes_____	No_____

B) Does facility handle F025 waste ?
Yes_____ No✓_____
If yes, which subcategory(ies) ?

Filters, filter aids, and/or desiccants [wastewater or non-wastewater] Yes_____ No_____
Light ends Yes_____ No_____

C) Does facility handle K061 waste ?
Yes_____ No✓_____
If yes, which subcategory(ies) ?

High zinc ≥ 15% Yes_____ No_____
Low zinc < 15% Yes_____ No_____

D) Does facility handle K069 waste ?
Yes_____ No✓_____
If yes, which subcategory(ies) ?

Calcium sulfate Yes_____ No_____
Non-calcium sulfate Yes_____ No_____

E) Does facility handle K106 waste ?
Yes_____ No✓_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____

F) Does facility handle P065 waste ?
Yes_____ No✓_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____

G) Does facility handle P092 waste ?
Yes_____ No✓_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____

H) Does facility handle U151 waste ?
Yes_____ No✓_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____
Radioactive elemental mercury Yes_____ No_____

California List Applicability

I. California List Waste Determination.

A) Using either knowledge of the waste or determination by the paint filter liquids test (PFLT), has the generator determined whether its waste is a liquid ?

Yes ✓ No _____

B) Current Applicability.

1) Do liquid hazardous wastes contain over 50 ppm PCBs ?

Yes _____ No ✓

2) Do hazardous wastes contain Halogenated Organic Compounds (HOCs) where it is identified as hazardous by a characteristic property that does not involve HOCs ?

Yes _____ No ✓

3) Do liquid hazardous wastes contain a total concentration of more than 134 mg/l of nickel and/or 130 mg/l of thallium ?

Yes _____ No ✓

See LDR Checklist pg. 8 if yes is answered to any of the above questions, the waste is currently subject to California List Prohibitions.

C) Historical Violations.

California List Prohibitions became effective on July 8, 1987 for wastes falling under any of the following descriptions:

1) Does the liquid hazardous waste, including free liquids associated with solid or sludge, contain free cyanide at concentrations $\geq$ 1000 mg/l ?

Yes _____ No ✓

2) Does liquid hazardous waste, including free liquids associated with any solid or sludge, contain the following metals (or elements) or compounds of these metals (or elements) at concentrations greater than or equal to these prohibition levels ?

Yes _____ No ✓

Arsenic	500 mg/l	Yes _____	No _____
Cadmium	100 mg/l	Yes _____	No _____
Chromium VI	500 mg/l	Yes _____	No _____
Lead	500 mg/l	Yes _____	No _____
Mercury	20 mg/l	Yes _____	No _____
Nickel	134 mg/l	Yes _____	No _____
Selenium	100 mg/l	Yes _____	No _____
Thallium	130 mg/l	Yes _____	No _____

3) Does the liquid (aqueous) hazardous waste have a pH ≤ 2 ?

Yes_____ No✓

4) N/A Do HOC wastewaters, defined as HOC-waste mixtures that are primarily water, contain ≥ 1000 mg/l but < 10,000 mg/l ?

Yes_____ No_____

5) Do other liquid hazardous wastes contain HOCs in total concentrations ≥ 1000 mg/l ?

Yes_____ No✓

6) Do non-liquid hazardous wastes contain HOCs in total concentrations > 1000 mg/kg ?

Yes_____ No✓

7) Do liquid hazardous wastes contain polychlorinated biphenyls (PCBs) at concentrations ≥ 50 ppm but < 500 ppm ?

Yes_____ No✓

8) Does the liquid hazardous waste contain PCBs ≥ 500 ppm ?

Yes_____ No✓

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Passaic Rubber Company

U.S. EPA ID No.: NJD002187755

Street: 45 Demarest Drive

City: Wayne State: NJ Zip: 07474-0505

Telephone: 201-696-9500

Inspection Date: 3/16/93 Time: 10 36 (am/pm)

Weather Conditions: Sunny ~37°

	Name	Agency/Title	Telephone
Inspectors:	Brian Farbanish	NJDEPE/Env Spec	201-299-7592
	Chris Sudol	Paterson Health Dep/Env Spec	201-881-3914
Facility Representatives:	Jeff Leach	Passaic Rubber/Executive VP	201-696-9500
	Marvin Roman	Passaic Rubber/Superintendent	201-696-9500

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	✓				
F020-F023 and F026-F028					
California List*					
First Third [40 CFR 268.10]					
Second Third [40 CFR 268.11]					
Third Third [40 CFR 268.12]	✓				

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

- cleaning machinery and certain rubber products
- unwanted material (removal)

LDR Waste Management:

wastes are temporarily stored on site and are then shipped to a TSD.

Summary:

Container, contingency plan, training and documentation violations were issued at the conclusion of the inspection

Signature: Brian Forbrich

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents: F003

2. F020-F023 and F026-F028 dioxin-containing wastes: _____

3. California List Wastes (See Appendix A): _____

4. First Third Wastes [40 CFR 268.10]: _____

5. Second Third Wastes [40 CFR 268.11]: _____

6. Third Third Wastes [40 CFR 268.12]**: D001

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

Yes ✓ No ___

If no, list below:

Assigned Classification	Correct Classification
_____	_____
_____	_____
_____	_____
_____	_____

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ✓ No ___ NA ___

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ___ No ___ NA ✓

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ___ No ___

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ___ No ✓ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ___ No ✓ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ___ No ✓ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes ___ No ✓ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ___ No ✓ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

   Yes ✓ No ___ NA ___

   If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
F003	___	✓
___	___	___
___	___	___

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

   Yes ___ No ___ NA ✓

   If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

   a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

   Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
D001	High TOC ignitable liquid		✓

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments_____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ___ No ✓ NA ___

c. Does the generator specify alternative treatment standards for lab packs?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

___ Organometallics: 40 Part 268, Appendix IV constituents
___ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs
___ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	___	__/__/__
___	___	__/__/__
___	___	__/__/__

Comments ___

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ✓ NA ___

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	___	___	___
___	___	___	___
___	___	___	___

Comments ___

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

Experience with material - Dog Food

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ___ No ✓ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ✓ NA ___

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ___ NA ✓

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

_____

_____

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ✓ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ✓

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	___
___	___
___	___

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

N/A

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
___	___
___	___
___	___

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ___ No ✓ (If No, do not complete this section.)

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

   Yes ___ No ___

   Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

   Yes ___ No ___ NA ___

   (If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

1HWR1631
03/15/93
0

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NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
WASTE MANIFESTS FROM 03/15/90 TO 03/15/93
FROM GENERATOR NJD002187755 TO SPECIFIED TSDF'S

GENERATOR	TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
-PASSAIC RUBBER CO. 45 DEMAREST DR. WAYNE , NJ NJD002187755	SAFETY-KLEEN CORP 1200 SYLVAN ST LINDEN , NJ NJD002182897	NJA0951865	04/04/91	D001	CHARACTERISTIC OF IGNITABILITY	843 P
				F005	NONHL SOLV & STLBTM	394 P

0 1 WORK FILE RECORDS READ
2 LINE ITEMS RECORDS READ

UNIROYAL CHEMICAL

Material Safety Data Shee

Uniroyal Chemical Company, Inc.
World Headquarters
Middlebury, CT 06749

UNIROYAL Emergency Phone: (203) 723-3670
CHEMTREC Transportation Emergency Phone: 1-800-424-9
SAFETY DATA Information (203) 573-3303

MSDS No. C209001 Date Issued: 7/26/85
Date Revised: 12/9/91 F

IDENTIFICATION

Trade Name: ARAZATE®

CAS Number: 1476-36-4

Chemical Name: Zinc dibenzyldithiocarbamate

Chemical Family: Dithiocarbamate

SPECIAL REGULATORY HAZARDS

Ingredient	CAS No.	Exposure Limit	OSHA (1910.1200)	EEC*
Product	14726-36-4	ND	Not hazardous	Not hazardous

Hazard assessment based on available data.

Transportation: NA

PHYSICAL DATA

Appearance and Odor: White-light gray powder; characteristic odor

Solubility: Slightly solube in water
Soluble in aromatic hydrocarbons

Melting Point: 347°F (175°C)

Boiling Point: NA

Other Data: ND

Specific Gravity (H_2O = 1): 1.41

Vapor Pressure @ 20° C. ND

Vapor Density (Air = 1): ND

Volatility @ 70° F: Negligible

FIRE AND EXPLOSION HAZARD DATA

Flash Point: 200°F (93.3°C) TCC

Autoignition Temp: ND

Extinquishing Media: Water spray, dry chemical

Flammable Limits: ND

Special Fire Fighting Procedures: Protect against inhalation of combustion products.

Unusual Hazards: May form explosive dust-air mixtures.

REACTIVITY DATA

Stability: Stable at ambient temperatures and pressures.

Incompatibility: Mineral acids.

Decomposition Products: Oxides of sulfur, nitrogen, carbon & sulfuric acid under burning conditions. Therm decomposition products are possibly zinc oxide, zinc sulfide, tetrabenzylthiourea, CS_2 and/or benzylthiocarbamate.

NA = Not Applicable ND = Not Determined *European Economic Communi

SPECIAL PROTECTION INFORMATION

Engineering Controls: Sufficient ventilation to minimize dust exposure. Protect closed handling systems against possible dust explosions. Avoid dust accumulation on building or equipment surfaces.

Personal Protection Equipment: Avoid all personal contact. Observe good personal hygiene. Chemical resistant gloves and goggles should be worn when handling. In the absence of adequate ventilation, use NIOSH-certified dust respirator.

STORAGE, SPILLS AND DISPOSAL INFORMATION

Storage: Store away from sources of direct heat in a dry area. Keep containers closed when not in use.

Spills: Vacuum up to avoid creating dust. Transfer into secure containers for proper disposal. Use personal protective equipment as outlined above.

Disposal: In accordance with any applicable local, state, or federal regulation regarding organic waste.

Environmental Information: Environmental effects have not been determined.

HEALTH RELATED DATA

Specific Hazard(s): Contact with skin may cause irritation*.

Primary Route(s) of Entry: Inhalation, skin absorption.

First Aid Procedures: **Eye contact:** Flush with water for 15 minutes.
Skin contact: Wash thoroughly with soap and water.

Toxicology Information:

Oral toxicity: LD50 (rats) - > 5 g/kg

No significant adverse effects have been noted with long-term production and use of this material.

*There have been no cases in which skin irritation was attributed to an interaction of Arazate in latex thread of clothing with chlorine bleach during laundering.

SARA TITLE III (40CFR 372)
SECTION 313 TOXIC CHEMICALS NOTIFICATION

TOXIC CHEMICAL	CAS #	% (BY WT.)
Zinc Compound	14726-36-4	100

Carcinogenic per NTP _____ IARC _____ OSHA _____ None ___X___

U. S. DEPARTMENT OF LABOR

Occupational Safety & Health Administration

MATERIAL SAFETY DATA SHEET

SECTION I

MANUFACTURER'S NAME	E. I. du Pont de Nemours & Co., Inc.
EMERGENCY TELEPHONE NO.	302-774-1000
ADDRESS (Number, Street, City, State, and ZIP Code)	Elastomers Dept., Wilmington, DE 19898
CHEMICAL NAME AND SYNONYMS	
TRADE NAME AND SYNONYMS	DIAK No. 1
CHEMICAL FAMILY	
FORMULA	hexamethylenediamine carbamate

SECTION II PHYSICAL DATA

~~BOILING POINT (°F.)~~ melting point	306-311°F	SPECIFIC GRAVITY (H_2O = 1)	1.28
VAPOR PRESSURE (mm Hg.)	not applicable	PERCENT VOLATILE BY VOLUME (%)	not applicable
VAPOR DENSITY (AIR = 1)	not applicable	EVAPORATION RATE (. . . = 1)	not applicable
SOLUBILITY IN WATER	soluble		

APPEARANCE AND ODOR: Very fine white powder. Slight amine odor.

SECTION III FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used) open cup	over 300°F	FLAMMABLE LIMITS	Lel / Uel

EXTINGUISHING MEDIA: Standard fire extinguishers.

SPECIAL FIRE FIGHTING PROCEDURES: Use regular procedures.

UNUSUAL FIRE AND EXPLOSION HAZARDS: May form flammable dust-air mixture. Keep dust away from heat, sparks, and open flame. Use only in areas provided with grounded equipment.

SECTION IV HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: None established.

EFFECTS OF OVEREXPOSURE: Causes eye irritation. May cause skin irritation.

EMERGENCY AND FIRST AID PROCEDURES: In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Call a physician. Flush skin with water.

NOTICE FROM DU PONT

The data in this Material Safety Data Sheet relates only to the specific material designated herein and does not relate to use in combination with any other material or in any process.

SECTION V REACTIVITY DATA

STABILITY	UNSTABLE		CONDITIONS TO AVOID
	STABLE	X	

INCOMPATABILITY *(Materials to avoid)*

HAZARDOUS DECOMPOSITION PRODUCTS

HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	X	

SECTION VI SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED Do not sweep because of creating dust hazard. Instead, soak up in oil dri or absorbent material. Flush spill area with water.

WASTE DISPOSAL METHOD Dispose according to federal, state, and local regulations.

SECTION VII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION *(Specify type)* Dust filter if area is dusty.

VENTILATION	LOCAL EXHAUST yes		SPECIAL
	MECHANICAL *(General)* yes		OTHER

Use with adequate ventilation. Do not breathe dust or fumes.

PROTECTIVE GLOVES yes	EYE PROTECTION safety glasses

OTHER PROTECTIVE EQUIPMENT Protective clothing. Avoid contact with eyes, skin, and clothing.

SECTION VIII SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING Wash thoroughly after handling.

OTHER PRECAUTIONS

June 1977

Mobil

0033

MOBIL OIL CORPORATION MATERIAL SAFETY DATA BULLETIN

REVISED: 09/20/89

********** I. PRODUCT IDENTIFICATION **********

MOBILPLEX 47

SUPPLIER:
MOBIL OIL CORP.

CHEMICAL NAMES AND SYNONYMS:
PET. HYDROCARBONS AND ADDITIVES

USE OR DESCRIPTION:
INDUSTRIAL GREASE

HEALTH EMERGENCY TELEPHONE:
(212) 883-4411

TRANSPORT EMERGENCY TELEPHONE:
(800) 424-9300 (CHEMTREC)

PRODUCT TECHNICAL INFORMATION:
(800) 662-4525

********** II. TYPICAL CHEMICAL AND PHYSICAL PROPERTIES **********

APPEARANCE: BROWN GREASE ODOR: MILD PH: NA
VISCOSITY AT 100 F, SUS: > 400.0 AT 40 C, CS: > 86.0
VISCOSITY AT 210 F, SUS: 70.0 AT 100 C, CS: 14.0
FLASH POINT F(C): > 400(204) . (ESTIMATED (OIL COC))
MELTING POINT F(C): NA POUR POINT F(C): NE
BOILING POINT F(C): > 600(316)
RELATIVE DENSITY, 15/4 C: 0.87 SOLUBILITY IN WATER: NEGLIGIBLE
VAPOR PRESSURE-MM HG 20C: < .1
NOTE: MOST PHYSICAL PROPERTIES FOR OIL COMPONENT.
NA=NOT APPLICABLE NE=NOT ESTABLISHED D=DECOMPOSES
FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE.

********** III. INGREDIENTS **********

	WT PCT (APPROX)	EXPOSURE LIMITS MG/M3	PPM	SOURCES (AND NOTES)
POTENTIALLY HAZARDOUS INGREDIENTS:				
NONE				
OTHER INGREDIENTS:				
REFINED MINERAL OILS	>75			
ADDITIVES AND/OR OTHER INGREDS.	<25			
PETROLEUM ASPHALTS	< 5			

SEE SECTION XII FOR COMPONENT REGULATORY INFORMATION.

SOURCES: A=ACGIH-TLV, A*=SUGGESTED-TLV, M=MOBIL, O=OSHA, S=SUPPLIER
NOTE: LIMITS SHOWN FOR GUIDANCE ONLY. FOLLOW APPLICABLE REGULATIONS.

********** IV. HEALTH HAZARD DATA **********

--- INCLUDES AGGRAVATED MEDICAL CONDITIONS, IF ESTABLISHED ---

EFFECTS OF OVEREXPOSURE: SLIGHT EYE IRRITATION. SLIGHT SKIN IRRITATION.

********** V. EMERGENCY AND FIRST AID PROCEDURES **********
--- FOR PRIMARY ROUTES OF ENTRY ---

EYE CONTACT: FLUSH WITH WATER.
SKIN CONTACT: WASH CONTACT AREAS WITH SOAP AND WATER. HIGH PRESSURE ACCIDENTAL INJECTION THROUGH THE SKIN REQUIRES IMMEDIATE MEDICAL ATTENTION FOR POSSIBLE INCISION, IRRIGATION AND/OR DEBRIDEMENT.
INHALATION: NOT EXPECTED TO BE A PROBLEM.
INGESTION: NOT EXPECTED TO BE A PROBLEM. HOWEVER, IF GREATER THAN 1/2 LITER(PINT) INGESTED, IMMEDIATELY GIVE 1 TO 2 GLASSES OF WATER AND CALL A PHYSICIAN, HOSPITAL EMERGENCY ROOM OR POISON CONTROL CENTER FOR ASSISTANCE. DO NOT INDUCE VOMITING OR GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.

********** VI. FIRE AND EXPLOSION HAZARD DATA **********
FLASH POINT F(C): > 400(204) (ESTIMATED (OIL COC))
FLAMMABLE LIMITS. LEL: .6 UEL: 7.0
EXTINGUISHING MEDIA: CO2, FOAM, DRY CHEMICAL
SPECIAL FIRE FIGHTING PROCEDURES: WATER OR FOAM MAY CAUSE FROTHING. USE WATER TO KEEP FIRE EXPOSED CONTAINERS COOL. WATER SPRAY MAY BE USED TO FLUSH SPILLS AWAY FROM EXPOSURE. FOR FIRES IN ENCLOSED AREAS, FIREFIGHTERS MUST USE SELF-CONTAINED BREATHING APPARATUS. PREVENT RUNOFF FROM FIRE CONTROL OR DILUTION FROM ENTERING STREAMS OR DRINKING WATER SUPPLY.
UNUSUAL FIRE AND EXPLOSION HAZARDS: NONE
NFPA HAZARD ID: HEALTH: 0, FLAMMABILITY: 1, REACTIVITY: 0

********** VII. REACTIVITY DATA **********
STABILITY (THERMAL, LIGHT, ETC.): STABLE
CONDITIONS TO AVOID: EXTREME HEAT
INCOMPATIBILITY (MATERIALS TO AVOID): STRONG OXIDIZERS
HAZARDOUS DECOMPOSITION PRODUCTS: CARBON MONOXIDE.
HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

********** VIII. SPILL OR LEAK PROCEDURE **********
ENVIRONMENTAL IMPACT: REPORT SPILLS AS REQUIRED TO APPROPRIATE AUTHORITIES. U. S. COAST GUARD REGULATIONS REQUIRE IMMEDIATE REPORTING OF SPILLS THAT COULD REACH ANY WATERWAY INCLUDING INTERMITTENT DRY CREEKS. REPORT SPILL TO COAST GUARD TOLL FREE NUMBER 800-424-8802.
PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: SHOVEL UP AND DISPOSE OF AT AN APPROPRIATE WASTE DISPOSAL FACILITY IN ACCORDANCE WITH CURRENT APPLICABLE LAWS AND REGULATIONS, AND PRODUCT CHARACTERISTICS AT TIME OF DISPOSAL.
WASTE MANAGEMENT: DISPOSE OF WASTE AT AN APPROPRIATE WASTE DISPOSAL FACILITY IN ACCORDANCE WITH CURRENT APPLICABLE LAWS AND REGULATIONS, AND PRODUCT CHARACTERISTICS AT TIME OF DISPOSAL.

********** IX. SPECIAL PROTECTION INFORMATION **********
EYE PROTECTION: GENERALLY EYE CONTACT IS UNLIKELY WITH THIS TYPE MATERIAL. IF EYE CONTACT IS LIKELY, SAFETY GLASSES WITH SIDE SHIELDS OR CHEMICAL TYPE GOGGLES SHOULD BE WORN.
SKIN PROTECTION: IF PROLONGED OR REPEATED SKIN CONTACT IS LIKELY, OIL IMPERVIOUS GLOVES SHOULD BE WORN. GOOD PERSONAL HYGIENE PRACTICES SHOULD ALWAYS BE FOLLOWED.
RESPIRATORY PROTECTION: NO SPECIAL REQUIREMENTS UNDER ORDINARY CONDITIONS OF USE AND WITH ADEQUATE VENTILATION.
VENTILATION: NO SPECIAL REQUIREMENTS UNDER ORDINARY CONDITIONS OF USE AND WITH ADEQUATE VENTILATION.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 12, 2015 - 3:11 PM

Version 5.0

User Selection Criteria

Location:	New Jersey, all activities	**Activity Location:**	None Chosen
Handler ID:	NJD002187755	**Group of IDs:**	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 08/12/2015		
Location County Code:	None Chosen	**Evaluation Type:**	
Location City:		**Focus Area:**	
Location Zip Code:		**Violation Type:**	
State District:	None Chosen	**Display Code Descrip.:**	Yes
Sort Order:	Region, State, Handler Name	**Display Universes:**	Yes

Results

Data meeting the criteria you selected follows.

Total Pages:6 Total Handlers:1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name:	cme_foia.rdf
Developed by:	EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed:	June 2006
Last Updated:	May 2012
Contact:	rcrainfo.help@epa.gov
Tables Used:	cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries:	none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 12, 2015 - 3:11 PM

PASSAIC RUBBER CO County Name / Code: PASSAIC / NJ031 **NJD002187755**

Location: 45 DEMAREST DR; WAYNE, NJ 07470 **REGION 02**

Mailing: 45 DEMAREST DR; WAYNE, NJ 07470

Activity Location: NJ | State District: NORTHERN | Accessibility: | Non-Notifier: | Extract Flag: Y | Active Site: N

Generator: N | Transporter: N | Operating TSDF: ------ | IC In Place: N | EI Indicator (HE / GW): N / N
Short-Term Gen: N | Transfer Facility: N | Offsite Receiver: N | HSM: N | Subpart K: ----
Full Enforcement: ------ | Converter: ------ | State Unaddressed SNC: N | EPA Unaddressed SNC: N
CA Wrkld: N | State TSDF: ------- | State Addressed SNC: N | EPA Addressed SNC: N
Active State Gen: N | State SNC w/Comp Sched: N | EPA SNC w/Comp Sched: N

Violation: Activity Location: NJ Type: 262.B Determined Date: 03/16/1993 Determined by Agency: State Responsible Agency: State
Scheduled Compliance Date: 03/31/1993 Actual Compliance Date: 03/25/1993 RTC Qualifier: OBSERVED Sequence Number: 1

CSE Evaluation 03/25/1993 Activity Location: NJ By: State Identifier: 000 Person: R2DEP Branch: NJ Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

CEI Evaluation 03/16/1993 Activity Location: NJ By: State Identifier: 000 Person: R2DEP Branch: NJ Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

Enforcement: Activity Location: NJ Type: 120 Action Date: 03/16/1993 Identifier: 000
Docket: Agency: State Responsible Person: R2DEP Branch: NJ
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Violation: Activity Location: NJ Type: 262.A Determined Date: 03/16/1993 Determined by Agency: State Responsible Agency: State
Scheduled Compliance Date: 03/31/1993 Actual Compliance Date: 03/25/1993 RTC Qualifier: OBSERVED Sequence Number: 2

CSE Evaluation 03/25/1993 Activity Location: NJ By: State Identifier: 000 Person: R2DEP Branch: NJ Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

CEI Evaluation 03/16/1993 Activity Location: NJ By: State Identifier: 000 Person: R2DEP Branch: NJ Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

Enforcement: Activity Location: NJ Type: 120 Action Date: 03/16/1993 Identifier: 000
Docket: Agency: State Responsible Person: R2DEP Branch: NJ
CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Violation: Activity Location: NJ Type: 262.A Determined Date: 03/16/1993 Determined by Agency: State Responsible Agency: State
Scheduled Compliance Date: 03/31/1993 Actual Compliance Date: 03/25/1993 RTC Qualifier: OBSERVED Sequence Number: 3

CSE Evaluation 03/25/1993 Activity Location: NJ By: State Identifier: 000 Person: R2DEP Branch: NJ Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

CEI Evaluation 03/16/1993 Activity Location: NJ By: State Identifier: 000 Person: R2DEP Branch: NJ Found Violation: YES
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:

* Note: Penalty amount may not reflect all violations cited.

PASSAIC RUBBER CO, NJD002187755, WAYNE, NJ, continued -

Enforcement: Activity Location: NJ | Type: 120 | Action Date: 03/16/1993 | Identifier: 000
Docket: | Agency: State | Responsible Person: R2DEP | Branch: NJ
CA Component: N | Disposition Status: | Appeal Initiated: | Appeal Resolved:

Evaluations With No Violations:

CEI Evaluation 04/26/2010 | Activity Location: NJ | By: State | Identifier: 001 | Person: NOMPK | Branch: N | Found Violation: NO
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: 04/26/2010 | Focus Area:

FCI Evaluation 04/16/2002 | Activity Location: NJ | By: State | Identifier: 001 | Person: NORJA | Branch: N | Found Violation: NO
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area: V3

CEI Evaluation 08/20/1997 | Activity Location: NJ | By: State | Identifier: 000 | Person: NJRA | Branch: N | Found Violation: NO
Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area:

Total Number of Handlers: 1
Total Number of Activity Locations: 1

*** End of Report ***

* Note: Penalty amount may not reflect all violations cited.

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

* Note: Penalty amount may not reflect all violations cited.

Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):

Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:

Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL
262.B	GENERATORS - MANIFEST

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
CSE	COMPLIANCE SCHEDULE EVALUATION
FCI	FOCUSED COMPLIANCE INSPECTION

Focus Area	Description
V3	CONVERTED FROM V2 RCRAINFO

* Note: Penalty amount may not reflect all violations cited.

Description of codes used on the report:

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

* Note: Penalty amount may not reflect all violations cited.